

1 PHILLIP A. TALBERT
United States Attorney
2 ALYSON A. BERG
Assistant U.S. Attorney
3 2500 Tulare Street, Suite 4401
Fresno, CA 93721
4 Telephone: (559) 497-4000
Facsimile: (559) 497-4099
5
6 Attorneys for Plaintiff
United States of America

7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$1,786,071.00 IN
U.S. CURRENCY, and

15 APPROXIMATELY \$242,963.00 IN
16 U.S. CURRENCY,

17 Defendants.
18

CASE NO. 1:22-MC-00119-AWI

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

19 It is hereby stipulated by and between the United States of America and potential claimant Sohail
20 Hussain Mamdani ("claimant"), by and through their respective counsel, as follows:

21 1. On or about June 2, 2022, claimant filed timely claims in the administrative forfeiture
22 proceeding with the Drug Enforcement Administration with respect to the Approximately \$1,786,071.00
23 in U.S. Currency and Approximately \$242,963.00 in U.S. Currency (hereafter collectively "defendant
24 currency"), which were seized on March 3, 2022.

25 2. The Drug Enforcement Administration sent the written notice of intent to forfeit required
26 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
27 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant
28 filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
4 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
5 parties. That deadline was August 31, 2022.

6 4. By Stipulation and Order filed August 16, 2022, the parties stipulated to extend to October
7 30, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
9 forfeiture.

10 5. By Stipulation and Order filed October 28, 2022, the parties stipulated to extend to
11 December 9, 2022, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
13 subject to forfeiture.

14 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
15 January 13, 2023, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
17 subject to forfeiture.

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

7. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to January 13, 2023.

Dated: December 6, 2022

PHILLIP A. TALBERT
United States Attorney

By: /s/ Alyson A. Berg
ALYSON A. BERG
Assistant U.S. Attorney

Dated: December 6, 2022

/s/ Kevin P. Rooney
KEVIN P. ROONEY
Attorney for claimant
Sohail Hussain Mamdani
(Signature approved by email on 12/6/22)

IT IS SO ORDERED.

Dated: December 7, 2022



SENIOR DISTRICT JUDGE